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Attorney for Defendant
LARRY W. CAMPBELL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) No. 2:03-cr-0483 WBS
Plaintiff,)
v.) STIPULATION AND [PROPOSED] ORDER
LARRY W. CAMPBELL,) VACATING DATES, CONTINUING CASE,
Defendant.) AND EXCLUDING TIME
Date: May 18, 2005
Time: 9:00 a.m.
Judge: Hon. William B. Shubb

IT IS HEREBY STIPULATED by and between Assistant United States Attorney Kymberly A. Smith, counsel for Plaintiff and Assistant Federal Defender Jeffrey L. Staniels, counsel for defendant LARRY W. CAMPBELL, that the trial confirmation hearing set for May 18, 2005, is reset to July 27, 2005 at 9:00 am and the jury trial date set for June 1, 2005 is reset to August 2, 2005 at 9:00 am. The matter is set for status conference on June 29, 2005, at 9:00 a.m.

Counsel have met and conferred initially on preparing a joint set of agreed-upon documentary exhibits; and a separate set of proposed exhibits, if any, as to which there are objections by one side or the other. It is anticipated that the parties will agree to the authenticity of all exhibits from the state court files, even if there are other objections. In connection with that undertaking, defense counsel has provided the government with approximately 1000 pages of documents previously obtained from the state court files. Counsel have also agreed to meet in the near future to discuss separate issues concerning potential "404(b)" materials. It is the belief of

1 both parties that these meetings will substantially shorten court time required for this case by
2 eliminating the time that would otherwise be consumed by introducing and authenticating the
3 many documents involved in the leadup to the proceeding or proceedings likely to be implicated in
4 the trial of this indictment. It is anticipated that documentary exhibits can be produced to the court
5 for review and/or in limine rulings, if any, by or before June 29, 2005.

6 **IT IS FURTHER STIPULATED** that time for trial under the Speedy Trial Act, 18
7 U.S.C. § 3161 *et. seq.* be excluded from May 18, 2005, through August 2, 2005, pursuant to 18
8 U.S.C. § 3161(h)(8)(A) & (B)(iv), Local Code T-4, to permit completion of the above described
9 trial preparation.

10 The court is advised that counsel have conferred about this new trial confirmation date
11 and Ms. Smith has authorized Mr. Staniels to sign this stipulation on her behalf.

12 **IT IS SO STIPULATED**

14 Dated: May 17, 2005

/S/ Jeffrey L. Staniels
JEFFREY L. STANIELS
Assistant Federal Defender
Attorney for Defendant
LARRY W. CAMPBELL

17 Dated: May 17, 2005

/S/ Kymberly A. Smith by jls per auth
Kymberly A. Smith
Assistant United States Attorney
Counsel for Plaintiff

20 **O R D E R**

21 **IT IS SO ORDERED.**

22 By the Court,

24 Dated: May 18, 2005


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE